

EXHIBIT A

STIPULATION OF SETTLEMENT

WHEREAS, Phillip Wu ("Wu") retained Berkman, Henoch, Peterson, Peddy & Fenchel, P.C. ("BHPPF") on February 19, 2015 to represent him in a Bankruptcy Proceeding entitled Queen Elizabeth Realty Corp. (USBC SDNY 13-12335) (the "Bankruptcy") and

WHEREAS, BHPPF represented Wu from February 19, 2015 to December 17, 2015 by providing legal services to Wu in the Bankruptcy and has outstanding legal fees in excess of the Stipulated Amount (defined herein) and

NOW, THEREFORE, in consideration of the foregoing, the covenants and promises set forth herein and other good and valuable consideration, the parties agree, represent and covenant as follows:


1. BHPPF's Payment Wu agrees that as reasonable and fair compensation for the services provided in the Bankruptcy by BHPPF to Wu, that BHPPF is entitled to \$60,000.00 for services performed (the "Stipulated Amount").
2. BHPPF's Lien Wu agrees that BHPPF is entitled to file a lien against him in the Bankruptcy proceeding and/or in the matrimonial proceeding entitled Wu V. Wu (NY Supreme Court Index # 300080/09).
3. Applicable Law This Stipulation shall be governed and construed in accordance with the laws of the State of New York, without reference to principles of conflicts of laws thereof.
4. Modifications Any changes hereto shall be made only in writing and shall only become effective and enforceable upon a writing being signed by the parties.
5. Representation By Counsel Wu represents that he has been represented by Bing Lee, Esq. in the negotiation, review and execution of this stipulation. By executing this

stipulation Wu represents that he understands that contents of this agreement and consents thereto.


6. Counterparts. This Stipulation may be signed in counterparts. Facsimile signatures of counsel only shall be deemed to be, and shall have the same effect as, original signatures.

Dated: December 23, 2015

BERKMAN, HENOCHE, PETERSON,
PEDDY & FENCHEL, P.C.

By: 
Erick R. Valley, Esq.
Berkman, Henoch, Peterson,
Peddy & Fenchel, P.C.
100 Garden City Plaza
Garden City, New York 11530

Phillip Wu

By: 
Phillip Wu